

STATE OF SOUTH CAROLINA )  
COUNTY OF ORANGEBURG )

IN THE COURT OF COMMON PLEAS  
FIRST JUDICIAL CIRCUIT

DAVID GAINEY, )

CASE NO.: 2025CP3800788

Plaintiff, )

v. )

**NOTICE TO STATE COURT OF  
REMOVAL TO FEDERAL DISTRICT  
COURT**

EXCLUSIVE MOVING AND )  
DELIVERY, LLC AND FRANKLYN )  
F. RODRIGUEZ, )

Defendants.

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To: Winnifa Brown  
Orangeburg County Clerk of Court

Plaintiff c/o his attorneys, James G. Biggart, II and M. Cooper Klaasmeyer,  
Morgan & Morgan P.A.

You are hereby notified of the filing of a Notice of Removal to the United States District Court for the District of South Carolina, Orangeburg Division for this case in accordance with the provisions of Section 1332, Title 28 of the United States Code. A copy of said Notice filed is attached hereto.

This 17<sup>th</sup> day of July 2025.

By: s/ W. James Flynn

W. James Flynn

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